



University of Hawaii at Manoa

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October 27, 1983

RP:0031

Mr. Shinji Soneda, Chief
State of Hawaii
Department of Health
Environmental Protection and
Health Services Division
Post Office Box 3378
Honolulu, Hawaii 96801

Dear Mr. Soneda:

Public Notice 83-EP-PW-15
National Pollutant Discharge Elimination System (NPDES) Permit (HI 0020303)
and Zone of Mixing (ZOM) Application (No. 24) Renewals
Hawaii Kai Community Services Company
Sandy Beach and Hawaii Kai Golf Course, Oahu

The Center has conducted a review of the above cited NPDES and ZOM renewal applications for discharge of treated domestic sewage into the Pacific Ocean at Sandy Beach (Class A waters) and to the Hawaii Kai Championship Golf Course Irrigation system. Please note that the Center submitted extensive comments regarding the ZOM renewal application in a letter dated September 16, 1983 for your consideration. Most likely our letter and this current Public Notice bypassed each other in the mail and so we have not re-addressed our earlier concerns in this review. Our Environmental Center review has been prepared with the assistance of Keith Chave, Oceanography; Reginald Young, Civil Engineering; and Jacquelin Miller and Pamela Bahnsen, Environmental Center.

We note that the NPDES Permit involves a discharge into the Pacific Ocean at "coordinates Latitude 21° 17' 13" N; Longitude 157° 40' 12" W and that the ZOM is to accommodate a discharge into the Pacific Ocean at "Latitude 21° 17' 11" N, Longitude 157° 40' 10" W." Both are referred to as Discharge Serial No. 001, and we believe there is but a single outfall at Sandy Beach. Its geodetic coordinates should be indicated consistently.

We further note that the design discharge was identified in the ZOM Application (dated 7/21/83) as 3.9 mgd whereas the current Public Notice states that the "Zone of Mixing is to be granted for an ultimate discharge flow of 5.8 mgd." We do not consider it appropriate for the Department to establish a ZOM to accommodate a discharge greater than that covered in the application.

Under Quality of Discharge, in the ZOM Application Renewal (7/21/83), Suspended Solids are given as 130 mg/l and Biochemical Oxygen Demand (BOD) as 48 mg/l. It is stated that these rates should reflect discharge measured "during the most intense month in the twelve month period preceding this application." The "Discharge Concentration

Limits" provided in the current Public Notice (9/27/83), however, list the limits for a "30-Day Average" to be 30 mg/l for both Biochemical Oxygen Demand and the Suspended Solids, respectively. It would appear that the proposed limitations are presently being exceeded.

In the ZOM Applications of 1973, 1978, and 1983 the Suspended Solids values were 22 mg/l, 24 mg/l, and 130 mg/l, respectively; the Total Dissolved Solids 2867 mg/l, 1858 mg/l, and 8225 mg/l, respectively; the BOD 23 mg/l, 21 mg/l, and 48 mg/l, respectively; and Total Nitrogen 9.26 mg/l, 6.40 mg/l, and 21.00 mg/l as TKN, respectively. Some explanation for the increase in these values seems appropriate.

Yours truly,



Doak C. Cox
Director

cc: Keith Chave
Reginald Young
Jacquelin Miller
Pamela Bahnsen